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9 Attorneys for WAYMO LLC

10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA

12 SAN FRANCISCO DIVISION

13 WAYMO LLC,

14 Plaintiff,

15 vs.

16 UBER TECHNOLOGIES, INC.;  
17 OTTOMOTTO LLC; OTTO TRUCKING  
LLC,

18 Defendants.

CASE NO. 3:17-cv-00939

**PLAINTIFF WAYMO'S DECLINATION  
TO STIPULATE TO THE SPECIAL  
MASTER'S FINDINGS REGARDING  
THE JACOBS LETTER AND RELATED  
DOCUMENTS**

Trial Date: February 5, 2018

1 On December 4, the Court referred to special master John Cooper the determination of  
2 “whether and to what extent, including the history of this action and both sides’ past conduct,  
3 defendants were required to earlier produce the Jacobs letter, resignation email, or settlement  
4 agreement, or required to provide any information in those documents in response to  
5 interrogatories, Court orders, or other agreements among counsel.” (Dkt. 2341.) The Court  
6 further asked whether the parties will stipulate that the special master’s findings will be  
7 final. (*Id.*) Waymo respectfully declines to stipulate to the finality of the special master’s  
8 findings. Waymo very much appreciates special master Cooper’s extensive work on this case, but  
9 given the importance of this issue at trial and as with other issues in this case, cannot so stipulate  
10 and forgo its rights to appeal rulings by the Special Master.

11  
12 DATED: December 7, 2017

QUINN EMANUEL URQUHART & SULLIVAN,  
LLP

13  
14 By /s/ Charles K. Verhoeven

Charles K. Verhoeven  
Attorneys for WAYMO LLC